

REMARKS

In response to the Office Action dated September 12, 2005, Applicants respectfully request reconsideration based on the above amendments and the following remarks.

Applicants respectfully submit that the claims as presented are in condition for allowance.

Claims 1, 11 and 23-34 are pending. Claims 1 and 11 are amended. Claims 2-10 and 12-22 have been canceled. Claims 23-34 are newly added. The amendments to the claims contain no new matter and are supported by the entire specification, including the drawings and the canceled claims.

The drawings were objected to and have been amended to comply with the USPTO rules and procedures. The specification has also been amended to comply with the drawings.

Claims 8 and 21 were objected to because of informalities and have been canceled.

Claims 1-21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Turnquist et al. in view of Applicants Admitted Prior Art (AAPA). This rejection is traversed for the following reasons.

Claim 1 recites, inter alia,

"reducing clearance between the packing ring and the rotor at a second location, the second location being adjacent to the first location, by disposing a second brush seal at said second location;

reducing clearance between the packing ring and the rotor at a third location, the third location being on a second end of the low-pressure turbine, by disposing a third brush seal at said third location;"

Support for these features is found at least at page 6, paragraph [0028] and Figure 1 of Applicants specification.

Neither Turnquist nor AAPA teach or suggest these features.

Turnquist teaches a plurality of packing ring segments that are provided in a stationary component and about a rotating shaft. Each packing ring segment includes a brush seal insert and a plurality of labyrinth seal teeth along a concave sealing face thereof. Each segment is formed of a pair of components, which, in assembly, have a split line through a slot receiving the brush seal insert. The brush seal insert includes a pair of narrow strips or rods welded to the outer ends of the bristle pack and, which are bendable to a range of diameters. By forming forward and backing surfaces defining the slot integral with the

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components, the width of the bristle slot and the gap between the bristle pack and the forward surface can be readily manufactured and obtained. (Abstract)

In contrast, the present application refers to four brush seals, each brush seal disposed in a specific location within the turbine. Neither Turnquist nor AAPA teach or suggest placing four additional brush seals in the four specific locations within the turbine of the embodiments of the present invention.

Consequently, the applied combination of Turnquist and AAPA, fail to teach at least "reducing clearance between the packing ring and the rotor at a second location, the second location being adjacent to the first location, by disposing a second brush seal at said second location;

reducing clearance between the packing ring and the rotor at a third location, the third location being on a second end of the low-pressure turbine, by disposing a third brush seal at said third location," as recited in claim 1.

For at least the above reasons, claim 1 is patentable over the applied combination of Turnquist and AAPA.

Claim 11 includes features similar to those discussed above with reference to claim 1 and is patentable over the applied combination of Turnquist and AAPA for at least the reasons advanced with reference to claim 1.

Claims 23-34 are newly added. Support for these features is found throughout Applicants specification.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance issued. If the Examiner believes that a telephone conference with Applicants attorneys would be advantageous to the disposition of this case, the Examiner is cordially requested to telephone the undersigned.

In the event the Commissioner of Patents and Trademarks deems additional fees to be due in connection with this application, Applicants attorney hereby authorizes that such fee be charged to Deposit Account No. 06-1130.

Respectfully submitted,

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